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14 June 2019

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Communication
Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59; *Call Authentication Trust Anchor*, WC Docket No. 17-97

Dear Ms. Dortch:

On 12 May 2019, the undersigned, Gunnar Halley, and Russ Penar - all from Microsoft Corporation - spoke by telephone with the following persons to discuss matters they felt could be addressed at the Commission's upcoming SHAKEN summit: Annick Banoun (CPD/WCB), Eduard Bartholme (CGB), Jerusha Burnett (CGB), Rebecca Chambers (Intern - CPD/WCB), Grace Chian (Intern for Chief Technology Officer), Matt Collins (CPD/WCB), Alex Espinoza (CPD/WCB), Kelsey Fayer (Intern - CPD/WCB), Connor Ferraro (CPD/WCB), Spencer Reeves (Intern - CPD/WCB), and Jordan Reth (CPD/WCB).

We expressed Microsoft's support for SHAKEN and the expectation that, once implemented broadly, SHAKEN will help to combat caller ID fraud and illegal robocalls. SHAKEN, however, is designed with a certain core set of technologies and business models in mind that is not representative of the entirety of voice communications options. We expressed an interest in industry-led efforts to improve upon the current iteration of SHAKEN so that legitimate voice calls from a broader set of calling technologies and business models would be eligible for highest level attestation under the standard, including one-way outbound-only VoIP calls, TDM calls, internationally-originated calls, and video relay service calls - a particularly important and time-sensitive goal given the potential that calls from these sources could otherwise be blocked by some terminating voice service providers. We recommended that this topic be raised and discussed at the summit to encourage industry awareness and efforts in that regard. We also raised concerns about the possibility that voice service providers may implement SHAKEN in a

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non-uniform manner by inextricably commingling attestation values with other analytics and suggested that this topic could be discussed at the summit to reduce the potential for consumer confusion or unreasonable outcomes.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced dockets. Please contact me if you require any additional information.

Respectfully submitted,

/s/ Paula Boyd

Paula Boyd
Senior Director, Government and Regulatory Affairs

cc (via e-mail):

Annick Banoun

Eduard Bartholme

Jerusha Burnett

Rebecca Chambers

Grace Chian

Matt Collins

Alex Espinoza

Kelsey Fayer

Connor Ferraro

Spencer Reeves

Jordan Reth